

Thomas More SOCIETY
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June 3, 2025

Honorable Karen M. Williams, U.S.D.J.
Mitchell H. Cohen Building & U.S. Courthouse
4th & Cooper Streets
Camden, NJ 08101

RE: Case Number: 1:23-CV-01469-KMW-EAP
Reading v. Duff, No. 23-cv-01469
Briefing Schedule

Dear Judge Williams,

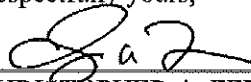
I write, on the consent of all opposing counsel, to request a modification of the briefing schedule deadline and brief length for Plaintiff contained in the prior Consent Order (Dkt. 122) as clarified by Your Honor's memo endorsement of my prior letter to the Court (Dkt.133). This is my first and only request for an extension of the time provided in the original Consent Order.

The original Consent Order provided that Plaintiff would have 30 days to file an omnibus answering brief of 45 pages from the date of the last 12(b)(6) motion filed, which was May 28, 2025. However, defendants have filed a total of 148 pages of 12(b)(6) briefing, including the 40-page oversize brief of the federal defendants filed with my consent and with the understanding that the federal defendants would consent to an extension of Plaintiff's time to respond and an enlargement of the omnibus answering brief. (Dkt. 135)

Contrary to my expectations, on reviewing defendants' 148 pages of briefing, I see that it will be impossible for me to address them adequately by June 27, given my deadlines in two pending litigations in the Southern District, including a brief and discovery responses due this week and Monday of next week, and the involvement of co-counsel in three pending suits against the Coast Guard, the Air Force and the University of Colorado, two of them class actions with deadlines in June and July. Another of our co-counsel, Tyler Brooks, recently left our firm and had to voluntarily withdraw from his representation in this case. I will also be out of the country from June 29 to July 25 in order to participate as a faculty member at a non-profit organization's annual academic conference in Italy followed by a vacation.

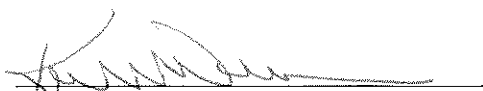
In view of these facts, and with the consent of opposing counsel, I respectfully request that Plaintiff's deadline to answer the 148 pages of briefs be extended to August 15, 2025, after my return from Europe, and that the omnibus answering brief be expanded to 50 pages. I can assure the Court that no further extensions will be requested. I thank Your Honor for her kind consideration of this request.

Respectfully yours,



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So Ordered on 6/6/2025.


KAREN M. WILLIAMS, U.S.D.J.